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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 **MARJORIE BISBEE**

2:16-cv-01500-JAD-PAL

11 Plaintiff,

12 v.

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES
(First Request)**

13 **CSAA GENERAL INSURANCE COMPANY;**
14 **DOES I through X; and ROE**
15 **CORPORATIONS I through X,**
16 **inclusive**

Defendant

17 IT IS HEREBY STIPULATED AND AGREED by Plaintiff, MARJORIE
18 BISBEE, and Defendant, CSAA GENERAL INSURANCE COMPANY to Extend
19 Discovery Deadlines by 60 days.

20 **A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:**

21 The following discovery has been completed by the parties:
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1. Defendant's Initial Disclosure, pursuant to FRCP 26(f);
2. Plaintiff's Initial Disclosure, pursuant to FRCP 26(f);
3. Defendant's First Set of Requests for Admissions to Plaintiff;
4. Defendant's First Set of Interrogatories to Plaintiff;
5. Defendant's First Set of Request for Production of Documents to Plaintiff;

B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE COMPLETED:

1. Depositions of the Person Most Knowledgeable from Plaintiff's medical providers relevant to treatment rendered to Plaintiff since the date of this accident;
2. Depositions of Plaintiff's claim handling expert who is located out of state;
3. Deposition of Plaintiff;
4. Deposition of Defense Experts.

A. THE REASONS WHY THE DISCOVERY REMAINING WAS NOT COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY ORDER:

The parties anticipate taking the depositions of the plaintiff, representatives from CSAA General and experts on the first available dates. Defense counsel is about to begin a two to three week trial, starting May 3, 2017 and will be

1 unavailable to schedule or coordinate the depositions.
2 Plaintiff's counsel has a trial beginning at the end of May that
3 is expected to last approximately four weeks.

4 The parties are not requesting to reopen the expert
5 deadlines, but instead request only a deadline to conduct
6 additional discovery. The parties believe that a modest
7 addition of sixty days will accommodate both parties
8 sufficiently to conclude the discovery that remains in this
9 matter.

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11 **D. A PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY:**

	Old Deadline	New Deadline
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13	Discovery Cut off:	05/10/2017 07/10/2017
14	Expert Disclosure:	03/10/2017 CLOSED
15	Rebuttal of Experts:	04/10/2017 CLOSED
16	Dispositive Motions:	06/10/2017 08/09/2017

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F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY
DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.

DATED this 26th day of April, 2017.

RANALLI ZANIEL FOWLER & MORAN, SEEGMILLER & ASSOCIATES
LLC


/s/ Benjamin J. Carman
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Marjorie Bisbee

ORDER

IT IS SO ORDERED:

Dated: April 28, 2017


UNITED STATES DISTRICT COURT
MAGISTRATE JUDGE